

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEBORAH S. SKEANS, Executrix of
the ESTATE OF FRANK E. PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE,
LLC, KEY COMMERCIAL
FINANCE PROPERTIES, LLC,
EQUITY PROS, LLC, and MOBILE
AGENCY, LLC

Defendants.

No. 1:18-cv-01516-CFC-MPT

JUSTIN BILLINGSLEY and KEY
COMMERCIAL FINANCE, LLC,

Third-Party
Plaintiffs,

v.

DEBORAH S. SKEANS and DARBIN
SKEANS,

Third-Party
Defendants.

**MOTION OF PLAINTIFF DEBORAH S. SKEANS FOR
LEAVE TO SUPPLEMENT VERIFIED COMPLAINT**

Plaintiff Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis, moves pursuant to Federal Rule of Civil Procedure 15(d) for leave to supplement the Verified Complaint filed on October 1, 2018 (D.I. 1) to include a claim for breach of contract with respect to the November 1, 2014 Note the Defendant Key

Commercial Finance, LLC purported to issue to Frank Pavlis. A copy of the proposed Supplemental Complaint is attached as Exhibit 1, with a black-lined version attached as Exhibit 2. The grounds for this motion are set forth in Opening Brief in Support of Motion of Plaintiff Deborah S. Skeans for Leave to File Supplemental Complaint, filed contemporaneously with this motion.

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Dated: January 20, 2021